

EXHIBIT A

EEOC Form 161-B (11/16)

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
NOTICE OF RIGHT TO SUE (ISSUED ON REQUEST)

To: Colleen Bodeux-pine

From: Houston District Office
 Mickey Leland Building
 1919 Smith Street, 7th Floor
 Houston, TX 77002



On behalf of person(s) aggrieved whose identity is
 CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

460-2020-00447

Shirley Almaguer,
Investigator

(346) 327-7693

(See also the additional information enclosed with this form.)

NOTICE TO THE PERSON AGGRIEVED:

Title VII of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA), or the Genetic Information Nondiscrimination Act (GINA): This is your Notice of Right to Sue, issued under Title VII, the ADA or GINA based on the above-numbered charge. It has been issued at your request. Your lawsuit under Title VII, the ADA or GINA **must be filed in a federal or state court WITHIN 90 DAYS of your receipt of this notice;** or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)



More than 180 days have passed since the filing of this charge.



Less than 180 days have passed since the filing of this charge, but I have determined that it is unlikely that the EEOC will be able to complete its administrative processing within 180 days from the filing of this charge.



The EEOC is terminating its processing of this charge.



The EEOC will continue to process this charge.

Age Discrimination in Employment Act (ADEA): You may sue under the ADEA at any time from 60 days after the charge was filed until 90 days after you receive notice that we have completed action on the charge. In this regard, **the paragraph marked below applies to your case:**



The EEOC is closing your case. Therefore, your lawsuit under the ADEA **must be filed in federal or state court WITHIN 90 DAYS of your receipt of this Notice.** Otherwise, your right to sue based on the above-numbered charge will be lost.



The EEOC is continuing its handling of your ADEA case. However, if 60 days have passed since the filing of the charge, you may file suit in federal or state court under the ADEA at this time.

Equal Pay Act (EPA): You already have the right to sue under the EPA (filing an EEOC charge is not required.) EPA suits must be brought in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

If you file suit, based on this charge, please send a copy of your court complaint to this office.

On behalf of the Commission

Shirley Almaguer

Digitally signed by Shirley Almaguer
 DN: cn=Shirley Almaguer, o=EEOC, ou=EEOC-Houston District
 Office, email=shirley.almaguer@eoc.gov, c=US
 Date: 2020.11.27 09:10:46 -0500

for

November 27, 2020

Enclosures(s)

Rayford O. Irvin,
District Director

(Date Mailed)

CC:

Andrew S. Golub, Esq.
Dow Golub Remels &
Gilbreath, PLLC
2700 Post Oak Blvd
Suite 1750
Houston, TX 77046

Andrew M. Williams, Esq.
ATTORNEY AT LAW
6565 West Loop South, Ste 560
Bellaire, TX 77401

TWC-Civil Rights Division
Lowell Keig, Executive Director
101 E. 15th Street, Room T 144
Austin, TX 78778

Enclosure with EEOC
Form 161-B (11/16)

**INFORMATION RELATED TO FILING SUIT
UNDER THE LAWS ENFORCED BY THE EEOC**

*(This information relates to filing suit in Federal or State court under Federal law.
If you also plan to sue claiming violations of State law, please be aware that time limits and other
provisions of State law may be shorter or more limited than those described below.)*

**PRIVATE SUIT RIGHTS -- Title VII of the Civil Rights Act, the Americans with Disabilities Act (ADA),
the Genetic Information Nondiscrimination Act (GINA), or the Age
Discrimination in Employment Act (ADEA):**

In order to pursue this matter further, you must file a lawsuit against the respondent(s) named in the charge within 90 days of the date you receive this Notice. Therefore, you should keep a record of this date. Once this 90-day period is over, your right to sue based on the charge referred to in this Notice will be lost. If you intend to consult an attorney, you should do so promptly. Give your attorney a copy of this Notice, and its envelope, and tell him or her the date you received it. Furthermore, in order to avoid any question that you did not act in a timely manner, it is prudent that your suit be filed within 90 days of the date this Notice was mailed to you (as indicated where the Notice is signed) or the date of the postmark, if later.

Your lawsuit may be filed in U.S. District Court or a State court of competent jurisdiction. (Usually, the appropriate State court is the general civil trial court.) Whether you file in Federal or State court is a matter for you to decide after talking to your attorney. Filing this Notice is not enough. You must file a "complaint" that contains a short statement of the facts of your case which shows that you are entitled to relief. Courts often require that a copy of your charge must be attached to the complaint you file in court. If so, you should remove your birth date from the charge. Some courts will not accept your complaint where the charge includes a date of birth. Your suit may include any matter alleged in the charge or, to the extent permitted by court decisions, matters like or related to the matters alleged in the charge. Generally, suits are brought in the State where the alleged unlawful practice occurred, but in some cases can be brought where relevant employment records are kept, where the employment would have been, or where the respondent has its main office. If you have simple questions, you usually can get answers from the office of the clerk of the court where you are bringing suit, but do not expect that office to write your complaint or make legal strategy decisions for you.

PRIVATE SUIT RIGHTS -- Equal Pay Act (EPA):

EPA suits must be filed in court within 2 years (3 years for willful violations) of the alleged EPA underpayment: back pay due for violations that occurred more than 2 years (3 years) before you file suit may not be collectible. For example, if you were underpaid under the EPA for work performed from 7/1/08 to 12/1/08, you should file suit before 7/1/10 – not 12/1/10 -- in order to recover unpaid wages due for July 2008. This time limit for filing an EPA suit is separate from the 90-day filing period under Title VII, the ADA, GINA or the ADEA referred to above. Therefore, if you also plan to sue under Title VII, the ADA, GINA or the ADEA, in addition to suing on the EPA claim, suit must be filed within 90 days of this Notice and within the 2- or 3-year EPA back pay recovery period.

ATTORNEY REPRESENTATION -- Title VII, the ADA or GINA:

If you cannot afford or have been unable to obtain a lawyer to represent you, the U.S. District Court having jurisdiction in your case may, in limited circumstances, assist you in obtaining a lawyer. Requests for such assistance must be made to the U.S. District Court in the form and manner it requires (you should be prepared to explain in detail your efforts to retain an attorney). Requests should be made well before the end of the 90-day period mentioned above, because such requests do not relieve you of the requirement to bring suit within 90 days.

ATTORNEY REFERRAL AND EEOC ASSISTANCE -- All Statutes:

You may contact the EEOC representative shown on your Notice if you need help in finding a lawyer or if you have any questions about your legal rights, including advice on which U.S. District Court can hear your case. If you need to inspect or obtain a copy of information in EEOC's file on the charge, please request it promptly in writing and provide your charge number (as shown on your Notice). While EEOC destroys charge files after a certain time, all charge files are kept for at least 6 months after our last action on the case. Therefore, if you file suit and want to review the charge file, please make your review request within 6 months of this Notice. (Before filing suit, any request should be made within the next 90 days.)

IF YOU FILE SUIT, PLEASE SEND A COPY OF YOUR COURT COMPLAINT TO THIS OFFICE.

EXHIBIT B-1

CAUSE NO. 202082640

RECEIPT NO. 887260

0.00

MTA

TR # 73826069

7616
533A

P-5

PLAINTIFF: BODEUX-PINE, COLLEEN
vs.

DEFENDANT: ROC-HOUSTON P A (D/B/A RECONSTRUCTIVE ORTHOPEDIC
CENTER OF HOUSTON)

In The 281st
Judicial District Court
of Harris County, Texas
281ST DISTRICT COURT
Houston, TX

CITATION

THE STATE OF TEXAS
County of Harris

TO: ROC-HOUSTON P A (D/B/A RECONSTRUCTIVE ORTHOPEDIC CENTER OF HOUSTON)
(IS A TEXAS PROFESSIONAL ASSOCIATION) MAY BE SERVED THROUGH ITS
REGISTERED AGENT MARCUS MASSON
OR WHEREVER HE MAY BE FOUND
1200 BINZ STREET SUITE 100 HOUSTON TX 77004

Attached is a copy of PLAINTIFF'S ORIGINAL PETITION AND REQUEST FOR DISCLOSURE

This instrument was filed on the 23rd day of December, 2020, in the above cited cause number
and court. The instrument attached describes the claim against you.

YOU HAVE BEEN SUED, You may employ an attorney. If you or your attorney do not file a
written answer with the District Clerk who issued this citation by 10:00 a.m on the Monday
next following the expiration of 20 days after you were served this citation and petition,
a default judgment may be taken against you.

TO OFFICER SERVING:

This citation was issued on 28th day of December, 2020, under my hand and
seal of said Court.

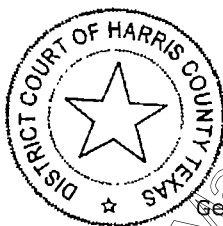
Issued at request of:

WILLIAMS, ANDREW M.
6565 WEST LOOP SOUTH SUITE 560

BELLAIRE, TX 77401

Tel: (713) 840-7321

Bar No.: 21510835



Marilyn Burgess

MARILYN BURGESS, District Clerk
Harris County, Texas

201 Caroline, Houston, Texas 77002

(P.O. Box 4651, Houston, Texas 77210)

Generated By: MOMON, RHONDA HWP//11654476

OFFICER/AUTHORIZED PERSON RETURN

Came to hand at _____ o'clock ____M., on the _____ day of _____,

Executed at (address) _____ in

_____ County at _____ o'clock ____M., on the _____ day of _____,

_____, by delivering to _____ defendant, in person, a

true copy of this Citation together with the accompanying _____ copy(ies) of the Petition

attached thereto and I endorsed on said copy of the Citation the date of delivery.

To certify which I affix my hand officially this _____ day of _____,

FEE: \$ _____

_____ of _____ County, Texas

By _____

Affiant

Deputy

On this day, _____, known to me to be the person whose
signature appears on the foregoing return, personally appeared. After being by me duly sworn,
he/she stated that this citation was executed by him/her in the exact manner recited on the
return.

SWORN TO AND SUBSCRIBED BEFORE ME, on this _____ day of _____,

Notary Public

Constable Return of Individual

Cause #: 202082640Tracking #: 73826069

In the case of BODEUX-PINE, COLLEEN VS ROC-HOUSTON P A (D/B/A RECONSTRUCTIVE ORTHOPEDIC CENTER OF HOUSTON) a CITATION and attached PLAINTIFF'S ORIGINAL PETITION AND REQUEST FOR DISCLOSURE was issued by the 281st Judicial District court of HARRIS County, TX and came to hand on the 7 day of January, 2021 at 1:49PM to be delivered at 1200 BINZ ST SUITE 100, HOUSTON, TX 77004 by delivering to: ROC-HOUSTON P A (D/B/A RECONSTRUCTIVE ORTHOPEDIC CENTER OF HOUSTON)

(Attempted service at 1200 BINZ ST, SUITE 100, HOUSTON, TX, 77004 unless otherwise noted.)

| Date | Time | Deputy Name | Agency | Service Attempt Type | Attempted Address | Remarks |
|----------|------------|---------------|--------|----------------------|--|---------|
| 1/8/2021 | 9:57:00 AM | Elton Charles | 7 | SERVED DEFENDANT | 1200 BINZ ST SUITE 100 HOUSTON TX 77004 | |

Service of Individual

Executed in HARRIS County, Texas by delivering to each of the within name defendant by ; a true copy of this CITATION together with the accompanying copy of the PLAINTIFF'S ORIGINAL PETITION AND REQUEST FOR DISCLOSURE, at the following times and places:

| Name | Date | Time | Full Address of Service |
|---|----------|--------|---|
| ROC-HOUSTON P A (D/B/A RECONSTRUCTIVE ORTHOPEDIC CENTER OF HOUSTON) | 1/8/2021 | 9:57AM | 1200 BINZ ST SUITE 100 HOUSTON TX 77004 |

Fee Due \$ 0.00by Deputy Elton Charles - 7C16

Printed

Deputy Signature Elton CharlesAttempts: 1Total Attempts: 1

May Walker, Constable Precinct #7

Harris County Texas

5290 Griggs Road
Houston Texas 77021
713.643.6118

County Auditor's Form 161E
Harris County, TX (REV. 03/01/2020)



HARRIS COUNTY, TEXAS
CNP7 ADMINISTRATION DIVISION
ANX E (CONST) 5290 GRIGGS RD , 1
5290 GRIGGS ROAD FLOOR 1
HOUSTON, TX 77021

Official Receipt

DATE: 01/07/2021
GC

ANDREW M WILLIAMS

RECEIPT: 000000040910

Case# 2020-82640

TOTAL AMOUNT: \$ 150

Description:

| <u>ITEM ID</u> | <u>DESCRIPTION</u> | <u>UNIT PRICE</u> | <u>NUMBER OF UNITS</u> | <u>LINE TOTAL</u> |
|----------------|--|-------------------|----------------------------|-------------------|
| 68288 | CITATION 100030710000425004 2020-82640 | \$75 | 2 | \$150 |

TOTAL PAYMENT DUE: \$ 150

| <u>PAYMENT METHOD</u> | <u>AMOUNT</u> | <u>Desc/Check/MO/Auth No</u> |
|---------------------------|---------------|------------------------------|
| CHCK | \$ 150 | 1066 |

PAYMENT TOTAL: \$ 150

CHANGE DUE: \$ 0

USER ID: 103517
2021-JAN-07 01.29.22.000000 PM

Andrew M. Williams & Associates

ATTORNEYS AT LAW
6565 WEST LOOP SOUTH, SUITE 560
BELLAIRE, TEXAS 77401
TELEPHONE: (713) 840-7321
FACSIMILE: (713) 839-1302
www.amwlawfirm.com

January 4, 2021

Via First Class Mail

Constable May Walker
Harris County Constable Precinct 7
5290 Griggs Road
Houston, Texas 77021

RE: Cause No. 2020-82640; *Colleen Bodeux-Pine vs. ROC-Houston, P.A. d/b/a
Reconstructive Orthopedic Center of Houston, and ROC ASC, L.L.P.*; In the District
Court Harris County, Texas, 281st Judicial District.

Dear Sir/Madam:

Enclosed you will find a check for \$150.00 payable to Harris County Constable along with the two (2) citations for service. Please serve the attached citations at the earliest possible and return to me in the enclosed self-address and stamped envelope your officer's return for our filing purposes.

Should you have any questions, feel free to contact me at (713) 840-7321.

Very truly yours,

Lesly Martinez

Lesly Martinez
Legal Secretary
Admin2@amwlawfirm.com

28364.Ltr

Andrew M. Williams & Associates
6565 West Loop South, Suite 560
Bellaire, Texas 77401



Andrew M. Williams & Associates
6565 West Loop South, Suite 560
Bellaire, Texas 77401

Unofficial Copy Office of Marilyn Burgess District Clerk

8

7616
533A

P-3

CAUSE NO. 202082640

RECEIPT NO. 887260

0.00

MTA

TR # 73826071

PLAINTIFF: BODEUX-PINE, COLLEEN

vs.

DEFENDANT: ROC-HOUSTON P A (D/B/A RECONSTRUCTIVE ORTHOPEDIC CENTER OF HOUSTON)

In The 281st
Judicial District Court
of Harris County, Texas
281ST DISTRICT COURT
Houston, TX

CITATION

THE STATE OF TEXAS
County of Harris

TO: ROC ASC LLP (IS A LIMITED LIABILITY PARTNERSHIP) MAY BE SERVED THROUGH
ITS PARTNER MARCUS MASSON
1200 BINZ STREET SUITE 100 HOUSTON TX 77004

Attached is a copy of PLAINTIFF'S ORIGINAL PETITION AND REQUEST FOR DISCLOSURE

This instrument was filed on the 23rd day of December, 2020, in the above cited cause number and court. The instrument attached describes the claim against you.

YOU HAVE BEEN SUED, You may employ an attorney. If you or your attorney do not file a written answer with the District Clerk who issued this citation by 10:00 a.m on the Monday next following the expiration of 20 days after you were served this citation and petition, a default judgment may be taken against you.

TO OFFICER SERVING:

This citation was issued on 28th day of December, 2020, under my hand and seal of said Court.

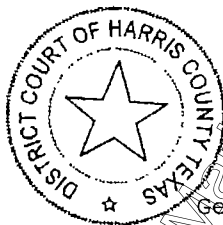
Issued at request of:

WILLIAMS, ANDREW M.
6565 WEST LOOP SOUTH SUITE 560

BELLAIRE, TX 77401

Tel: (713) 840-7321

Bar No.: 21510835



Marilyn Burgess

MARILYN BURGESS, District Clerk
Harris County, Texas

201 Caroline, Houston, Texas 77002

(P.O. Box 4651, Houston, Texas 77210)

Generated By: MOMON, RHONDA HWP//11654476

OFFICER/AUTHORIZED PERSON RETURN

Came to hand at _____ o'clock ____ .M. on the _____ day of _____, _____.

Executed at (address) _____ in

_____ County at _____ o'clock ____ .M., on the _____ day of _____,

_____, by delivering to _____ defendant, in person, a

true copy of this Citation together with the accompanying _____ copy(ies) of the Petition

attached thereto and I endorsed on said copy of the Citation the date of delivery.

To certify which I affix my hand officially this _____ day of _____, _____.

FEE: \$ _____

_____ of _____ County, Texas

By _____

Affiant

Deputy

On this day, _____, known to me to be the person whose signature appears on the foregoing return, personally appeared. After being by me duly sworn, he/she stated that this citation was executed by him/her in the exact manner recited on the return.

SWORN TO AND SUBSCRIBED BEFORE ME, on this _____ day of _____, _____.

Notary Public

957 1/6

Unofficial Copy Office of Marilyn Burgess District Clerk
01-13-2021
Marilyn Burgess
District Clerk
JAN 13 2021
Harris County, Texas
Mail Processing Clerk

Constable Return of IndividualCause #: 202082640Tracking #: 73826071

In the case of BODEUX-PINE, COLLEEN VS ROC-HOUSTON P A (D/B/A RECONSTRUCTIVE ORTHOPEDIC CENTER OF HOUSTON) a CITATION and attached PLAINTIFF'S ORIGINAL PETITION AND REQUEST FOR DISCLOSURE was issued by the 281st Judicial District court of HARRIS County, TX and came to hand on the 7 day of January, 2021 at 2:06PM to be delivered at 1200 BINZ ST SUITE 100, HOUSTON, TX 77004 by delivering to: ROC ASC LLP (IS A LIMITED LIABILITY PARTNERSHIP) MAY BE SERVED THROUGH

(Attempted service at 1200 BINZ ST, SUITE 100, HOUSTON, TX, 77004 unless otherwise noted.)

| Date | Time | Deputy Name | Agency | Service Attempt Type | Attempted Address | Remarks |
|----------|------------|---------------|--------|----------------------|--|---------|
| 1/8/2021 | 9:57:00 AM | Elton Charles | 7 | SERVED DEFENDANT | 1200 BINZ ST SUITE 100 HOUSTON TX 77004 | |

Service of Individual

Executed in HARRIS County, Texas by delivering to each of the within name defendant by ; a true copy of this CITATION together with the accompanying copy of the PLAINTIFF'S ORIGINAL PETITION AND REQUEST FOR DISCLOSURE, at the following times and places:

| Name | Date | Time | Full Address of Service |
|--|----------|--------|---|
| ROC ASC LLP (IS A LIMITED LIABILITY PARTNERSHIP) MAY BE SERVED THROUGH | 1/8/2021 | 9:57AM | 1200 BINZ ST SUITE 100 HOUSTON TX 77004 |

Fee Due \$ 0.00by Deputy Elton Charles - 7C16Printed: Elton CharlesDeputy Signature Elton CharlesAttempts: 1Total Attempts: 1**May Walker, Constable Precinct #7****Harris County Texas**5290 Griggs Road
Houston Texas 77021
713.643.6118**FILED**
Marilyn Burgess
District ClerkTime: JAN 13 2021
By May Walker
Harris County, Texas
Mail Processing Clerk

County Auditor's Form 161E
Harris County, TX (REV. 03/01/2020)



HARRIS COUNTY, TEXAS
CNP7 ADMINISTRATION DIVISION
ANX E (CONST) 5290 GRIGGS RD , 1
5290 GRIGGS ROAD FLOOR 1
HOUSTON, TX 77021

Official Receipt

DATE: 01/07/2021
GC

ANDREW M WILLIAMS

RECEIPT: 000000040910

Case# 2020-82640

TOTAL AMOUNT: \$ 150

Description:

| <u>ITEM ID</u> | <u>DESCRIPTION</u> | <u>UNIT PRICE</u> | <u>NUMBER OF UNITS</u> | <u>LINE TOTAL</u> |
|----------------|--|-------------------|----------------------------|-------------------|
| 68288 | CITATION 100030710000425004 2020-82640 | \$75 | 2 | \$150 |

TOTAL PAYMENT DUE: \$ 150

**PAYMENT
METHOD**
CHCK

AMOUNT
\$ 150

Desc/Check/MO/Auth No
1066

PAYMENT TOTAL: \$ 150

CHANGE DUE: \$ 0

USER ID: 103517
2021-JAN-07 01.29.22.000000 PM

EXHIBIT B-2

2020-82640 / Court: 281

CAUSE NO. _____

| | | |
|---------------------------|---|-------------------------|
| COLLEEN BODEUX-PINE, | § | IN THE DISTRICT COURT |
| Plaintiff | § | |
| | § | |
| V. | § | HARRIS COUNTY, TEXAS |
| | § | |
| | § | |
| ROC-HOUSTON, P.A. d/b/a | § | |
| RECONSTRUCTIVE ORTHOPEDIC | § | |
| CENTER OF HOUSTON, AND | § | |
| ROC ASC, L.L.P. | § | |
| Defendants | § | _____ JUDICIAL DISTRICT |

PLAINTIFF'S ORIGINAL PETITION AND REQUEST FOR DISCLOSURE

TO THE HONORABLE COURT:

Plaintiff COLLEEN BODEUX-PINE complains of ROC-HOUSTON, P.A.
d/b/a RECONSTRUCTIVE ORTHOPEDIC CENTER OF HOUSTON AND ROC
ASC, L.L.P., defendants.

DISCOVERY CONTROL PLAN LEVEL

1. Plaintiff intends to conduct discovery under Level 3, pursuant to Rule
190.4 of the Texas Rules of Civil Procedure. Under Texas Rule of Civil Procedure
47(c)(4), she seeks an amount between \$200,000 and \$1,000,000.

JURY DEMAND

2. Plaintiff respectfully demands a trial by jury.

PARTIES

3. Plaintiff is an individual who resides in Fort Bend County, Texas, and was employed by Defendants in Houston, Harris County, Texas, when her causes of action accrued.

4. Defendant ROC-HOUSTON, P.A. d/b/a RECONSTRUCTIVE ORTHOPEDIC CENTER OF HOUSTON, ("ROC") is a Texas professional association. It may be served through its registered agent for service, Marcus Masson, at 1200 Binz Street, Suite 100, Houston, Texas or wherever he may be found. Service is requested.

5. Defendant ROC ASC, L.L.P. ("ROC ASC") is a Limited Liability Partnership that may be served by and through its partner, Marcus Masson, at 1200 Binz Street, Suite 100, Houston, Texas or wherever he may be found. Service is requested.

VENUE AND JURISDICTION

6. Venue is proper in Harris County, Texas, because that is where all or part of the events and omissions giving rise to this lawsuit took place.

FACTS

7. Plaintiff went to work for Defendants, who operate an orthopedic surgery practice, December 13, 2017. She served as Director of Finance. Throughout the time she was there, she and other women were subjected to continuous sexual invitations, suggestions and banter from the doctors who own the practice. In the fall of 2019, she complained about the business's failure to pay overtime to

the clerical staff she supervised. She also let the practice know in September 2019 that she had consulted a lawyer about the sexual harassment and hostile environment. Immediately after she did so, she was summoned to a September 25 meeting at which representatives of the practice accused her of failing to come to work on time and of sleeping on the job, neither of which was true. She was terminated on November 8, 2019, in retaliation for her complaints.

8. Plaintiff witnessed and endured no end of sexual harassment and a hostile working environment during her employment with Defendants. Those examples included, but were not limited to, the following:

- Plaintiff watched Dr. Fernando Levaro, a physician with the practice, describe a surgical procedure to a female employee named Mireya, putting his hands on her arm and coming near to or actually touching her breast as he did so. That led her to write an e-mail on April 26, 2018, to Lorena Cordelio-Ross, director of human resources for Defendants.
- Respondent's male doctors constantly made unprofessional comments about women employees. On October 18, 2019, Plaintiff sent an e-mail to Ms. Cordelio-Ross and Defendants' CFO, Mr. Christopher Cola, dated October 18, 2019. It references multiple incidents and a meeting September 25, 2019, at which she had discussed those incidents with the two recipients of the e-mail. In one such incident, Plaintiff recalled that in July 2018, Dr. Marcos Masson asked, "Colleen, when am I going to do you?" She was embarrassed and did not answer. He then said, "Ha ha, I mean your surgery." She replied, "Friday, sir." Dr. Masson said, "Good. I can't wait to be inside of you." He said that in the clinic in front of patients and medical assistants.
- In the same e-mail, Plaintiff recalled that about 10 days before Dr. Masson performed surgery for her, he did injections on both her feet. A medical assistant, Magda Sanchez, came into the room. Dr.

Masson said, "Oh, good. I should be so happy. I get to do two directors at the same time."

- The day before Plaintiff's surgery, which was scheduled on September 20, 2019, heavy rain flooded much of Houston. Ms. Cornelio-Ross, Michelle Kirkpatrick (the practice administrator) and Plaintiff were not able to get home. Lorena and Michelle told Dr. Masson that the three of them were planning to stay in the conference room. Ms. Kirkpatrick said Dr. Masson told her they could stay at his apartment if we promised to walk around naked. Plaintiff was so concerned she told a surgical nurse named Erica to make sure her underwear stayed on the entire time that Dr. Masson was performing surgery on her feet.
- In the September 25, 2019, meeting, Plaintiff asked Mr. Cola and Ms. Cornelio-Ross to make sure she not be sexually harassed again. Examples of sexual harassment included incidents in which James Masson, brother of Dr. Marcos Masson who works at the clinic, made comments about her buttocks and touched it on more than one occasion.
- Dr. Marcos Masson said "f--- me" to women employees frequently. Plaintiff understood it to be an invitation.
- Dr. Yevghany Shuhatovich, another doctor with the practice, told Plaintiff she should "take one for the team" and have sex with Dr. Marcos Masson.
- Ms. Cornelio-Ross told Plaintiff that sort of incident represented "the accepted culture of this practice."
- Maria Dansbury filed a charge with the EEOC complaining of a hostile environment after Eddie Masson, Dr. Marcos Masson's brother, tried to kiss her in the office. She was treated badly after she complained to Ms. Cordelio-Ross.
- After Plaintiff was terminated, Defendants gave prospective employers negative reports about her, prolonging her unemployment and increasing her damages.

TIMELINESS

9. Plaintiff filed her lawsuit within two years of the discrimination and within days of receiving permission to sue from the EEOC.

ADMINISTRATIVE CONDITIONS

10. Plaintiff has completed all administrative conditions precedent.

NO FEDERAL CLAIMS

11. Plaintiff does not assert any federal claims in this proceeding. She is in no way seeking damages or remedies that may stem from a federal cause of action.

DAMAGES

12. As a direct and proximate result of the aforementioned acts, Plaintiff has suffered grievous harm including, but not limited to, substantial loss of income; humiliation and embarrassment among her coworkers and others in the medical community; and damage to her prospects for future employment.

ATTORNEY FEES

13. Defendants' conduct as described above has forced Plaintiff to retain the services of the undersigned attorney to pursue justice. She seeks her reasonable and necessary attorney fees.

REQUESTS FOR DISCLOSURE

14. Plaintiff serves requests for disclosure to both Defendants under Texas Rule of Civil Procedure 194.2.

PRAYER

For all the above reasons, Plaintiffs ask that Defendants be cited to appear and answer, and on final trial, that Plaintiff have the following relief:

- Judgment against Defendants for her actual damages;
- Judgment for front pay;
- General damages for harm to her reputation;
- Damages for mental pain and mental anguish and compensatory damages;
- Reasonable and necessary attorneys' fees;
- Prejudgment and post-judgment interest;
- Costs of court; and
- All other and further relief to which she is justly entitled.

Respectfully submitted,

ANDREW M. WILLIAMS & ASSOCIATES

By: /s/ Andrew M. Williams
Andrew M. Williams
SBN 21510835
6565 West Loop South, Suite 560
Bellaire, Texas 77401
(713) 840-7321 - Telephone
(713) 839-1302 - Facsimile
andy@amwlawfirm.com - Email

ATTORNEY FOR PLAINTIFF

CAUSE NO. 202082640

RECEIPT NO. 887260

0.00

MTA

TR # 73826071

PLAINTIFF: BODEUX-PINE, COLLEEN

vs.

DEFENDANT: ROC-HOUSTON P A (D/B/A RECONSTRUCTIVE ORTHOPEDIC
CENTER OF HOUSTON)In The 281st
Judicial District Court
of Harris County, Texas
281ST DISTRICT COURT
Houston, TXTHE STATE OF TEXAS
County of Harris

CITATION

SERVED THIS 8 DAY OF Jan, 2021
MAY WALKER, CONSTABLE PRECINCT SEVEN
HOUSTON, HARRIS TEXAS
BY Charles, DEPUTYTO: ROC ASC LLP (IS A LIMITED LIABILITY PARTNERSHIP) MAY BE SERVED THROUGH
ITS PARTNER MARCUS MASSON
1200 BINZ STREET SUITE 100 HOUSTON TX 77004Attached is a copy of PLAINTIFF'S ORIGINAL PETITION AND REQUEST FOR DISCLOSUREThis instrument was filed on the 23rd day of December, 2020, in the above cited cause number
and court. The instrument attached describes the claim against you.YOU HAVE BEEN SUED, You may employ an attorney. If you or your attorney do not file a
written answer with the District Clerk who issued this citation by 10:00 a.m on the Monday
next following the expiration of 20 days after you were served this citation and petition,
a default judgment may be taken against you.

TO OFFICER SERVING:

This citation was issued on 28th day of December, 2020, under my hand and
seal of said Court.Issued at request of:WILLIAMS, ANDREW M.
6565 WEST LOOP SOUTH SUITE 560

BELLAIRE, TX 77401

Tel: (713) 840-7321

Bar No.: 21510835*mail Burgess*MARILYN BURGESS, District Clerk
Harris County, Texas
201 Caroline, Houston, Texas 77002
(P.O. Box 4651, Houston, Texas 77210)

Generated By: MOMON, RHONDA HWP//11654476

OFFICER/AUTHORIZED PERSON RETURN

Came to hand at _____ o'clock ____ .M., on the _____ day of _____, _____.

Executed at (address) _____ in

_____ County at _____ o'clock ____ .M., on the _____ day of _____,

_____, by delivering to _____ defendant, in person, a

true copy of this Citation together with the accompanying _____ copy(ies) of the Petition

attached thereto and I endorsed on said copy of the Citation the date of delivery.

To certify which I affix my hand officially this _____ day of _____, _____.

FEE: \$ _____

_____ of _____ County, Texas

By _____
Affiant DeputyOn this day, _____, known to me to be the person whose
signature appears on the foregoing return, personally appeared. After being by me duly sworn,
he/she stated that this citation was executed by him/her in the exact manner recited on the
return.

SWORN TO AND SUBSCRIBED BEFORE ME, on this _____ day of _____, _____.

Notary Public

2020-82640 / Court: 281

CAUSE NO. _____

COLLEEN BODEUX-PINE,
Plaintiff

V.

ROC-HOUSTON, P.A. d/b/a
RECONSTRUCTIVE ORTHOPEDIC
CENTER OF HOUSTON, AND
ROC ASC, L.L.P.
Defendants

§
§
§
§
§
§
§
§
§

IN THE DISTRICT COURT

HARRIS COUNTY, TEXAS

_____ JUDICIAL DISTRICT

PLAINTIFF'S ORIGINAL PETITION AND REQUEST FOR DISCLOSURE

TO THE HONORABLE COURT:

Plaintiff COLLEEN BODEUX-PINE complains of ROC-HOUSTON, P.A.
d/b/a RECONSTRUCTIVE ORTHOPEDIC CENTER OF HOUSTON AND ROC
ASC, L.L.P., defendants.

DISCOVERY CONTROL PLAN LEVEL

1. Plaintiff intends to conduct discovery under Level 3, pursuant to Rule
190.4 of the Texas Rules of Civil Procedure. Under Texas Rule of Civil Procedure
47(c)(4), she seeks an amount between \$200,000 and \$1,000,000.

JURY DEMAND

2. Plaintiff respectfully demands a trial by jury.

PARTIES

3. Plaintiff is an individual who resides in Fort Bend County, Texas, and was employed by Defendants in Houston, Harris County, Texas, when her causes of action accrued.

4. Defendant ROC-HOUSTON, P.A. d/b/a RECONSTRUCTIVE ORTHOPEDIC CENTER OF HOUSTON, ("ROC") is a Texas professional association. It may be served through its registered agent for service, Marcus Masson, at 1200 Binz Street, Suite 100, Houston, Texas or wherever he may be found. Service is requested.

5. Defendant ROC ASC, L.L.P. ("ROC ASC") is a Limited Liability Partnership that may be served by and through its partner, Marcus Masson, at 1200 Binz Street, Suite 100, Houston, Texas or wherever he may be found. Service is requested.

VENUE AND JURISDICTION

6. Venue is proper in Harris County, Texas, because that is where all or part of the events and omissions giving rise to this lawsuit took place.

FACTS

7. Plaintiff went to work for Defendants, who operate an orthopedic surgery practice, December 13, 2017. She served as Director of Finance. Throughout the time she was there, she and other women were subjected to continuous sexual invitations, suggestions and banter from the doctors who own the practice. In the fall of 2019, she complained about the business's failure to pay overtime to

the clerical staff she supervised. She also let the practice know in September 2019 that she had consulted a lawyer about the sexual harassment and hostile environment. Immediately after she did so, she was summoned to a September 25 meeting at which representatives of the practice accused her of failing to come to work on time and of sleeping on the job, neither of which was true. She was terminated on November 8, 2019, in retaliation for her complaints.

8. Plaintiff witnessed and endured no end of sexual harassment and a hostile working environment during her employment with Defendants. Those examples included, but were not limited to, the following:

- Plaintiff watched Dr. Fernando Levaro, a physician with the practice, describe a surgical procedure to a female employee named Mireya, putting his hands on her arm and coming near to or actually touching her breast as he did so. That led her to write an e-mail on April 26, 2018, to Lorena Cordelio-Ross, director of human resources for Defendants.
- Respondent's male doctors constantly made unprofessional comments about women employees. On October 18, 2019, Plaintiff sent an e-mail to Ms. Cordelio-Ross and Defendants' CFO, Mr. Christopher Cola, dated October 18, 2019. It references multiple incidents and a meeting September 25, 2019, at which she had discussed those incidents with the two recipients of the e-mail. In one such incident, Plaintiff recalled that in July 2018, Dr. Marcos Masson asked, "Colleen, when am I going to do you?" She was embarrassed and did not answer. He then said, "Ha ha, I mean your surgery." She replied, "Friday, sir." Dr. Masson said, "Good. I can't wait to be inside of you." He said that in the clinic in front of patients and medical assistants.
- In the same e-mail, Plaintiff recalled that about 10 days before Dr. Masson performed surgery for her, he did injections on both her feet. A medical assistant, Magda Sanchez, came into the room. Dr.

Masson said, "Oh, good. I should be so happy. I get to do two directors at the same time."

- The day before Plaintiff's surgery, which was scheduled on September 20, 2019, heavy rain flooded much of Houston. Ms. Cornelio-Ross, Michelle Kirkpatrick (the practice administrator) and Plaintiff were not able to get home. Lorena and Michelle told Dr. Masson that the three of them were planning to stay in the conference room. Ms. Kirkpatrick said Dr. Masson told her they could stay at his apartment if we promised to walk around naked. Plaintiff was so concerned she told a surgical nurse named Erica to make sure her underwear stayed on the entire time that Dr. Masson was performing surgery on her feet.
- In the September 25, 2019, meeting, Plaintiff asked Mr. Cola and Ms. Cornelio-Ross to make sure she not be sexually harassed again. Examples of sexual harassment included incidents in which James Masson, brother of Dr. Marcos Masson who works at the clinic, made comments about her buttocks and touched it on more than one occasion.
- Dr. Marcos Masson said "f--- me" to women employees frequently. Plaintiff understood it to be an invitation.
- Dr. Yevghany Shuhatovich, another doctor with the practice, told Plaintiff she should "take one for the team" and have sex with Dr. Marcos Masson.
- Ms. Cornelio-Ross told Plaintiff that sort of incident represented "the accepted culture of this practice."
- Maria Dansbury filed a charge with the EEOC complaining of a hostile environment after Eddie Masson, Dr. Marcos Masson's brother, tried to kiss her in the office. She was treated badly after she complained to Ms. Cordelio-Ross.
- After Plaintiff was terminated, Defendants gave prospective employers negative reports about her, prolonging her unemployment and increasing her damages.

TIMELINESS

9. Plaintiff filed her lawsuit within two years of the discrimination and within days of receiving permission to sue from the EEOC.

ADMINISTRATIVE CONDITIONS

10. Plaintiff has completed all administrative conditions precedent.

NO FEDERAL CLAIMS

11. Plaintiff does not assert any federal claims in this proceeding. She is in no way seeking damages or remedies that may stem from a federal cause of action.

DAMAGES

12. As a direct and proximate result of the aforementioned acts, Plaintiff has suffered grievous harm including, but not limited to, substantial loss of income; humiliation and embarrassment among her coworkers and others in the medical community; and damage to her prospects for future employment.

ATTORNEY FEES

13. Defendants' conduct as described above has forced Plaintiff to retain the services of the undersigned attorney to pursue justice. She seeks her reasonable and necessary attorney fees.

REQUESTS FOR DISCLOSURE

14. Plaintiff serves requests for disclosure to both Defendants under Texas Rule of Civil Procedure 194.2.

PRAYER

For all the above reasons, Plaintiffs ask that Defendants be cited to appear and answer, and on final trial, that Plaintiff have the following relief:

- Judgment against Defendants for her actual damages;
- Judgment for front pay;
- General damages for harm to her reputation;
- Damages for mental pain and mental anguish and compensatory damages;
- Reasonable and necessary attorneys' fees;
- Prejudgment and post-judgment interest;
- Costs of court; and
- All other and further relief to which she is justly entitled.

Respectfully submitted,

ANDREW M. WILLIAMS & ASSOCIATES

By: /s/ Andrew M. Williams
Andrew M. Williams
SBN 21510835
6565 West Loop South, Suite 560
Bellaire, Texas 77401
(713) 840-7321 - Telephone
(713) 839-1302 - Facsimile
andy@amwlawfirm.com - Email

ATTORNEY FOR PLAINTIFF

CAUSE NO. 2020-82640

| | | |
|---------------------------|---|-------------------------------------|
| COLLEEN BODEUX-PINE, | § | IN THE DISTRICT COURT OF |
| <i>PLAINTIFF</i> | § | |
| | § | |
| VS. | § | |
| | § | HARRIS COUNTY, TEXAS |
| ROC-HOUSTON, P.A. D/B/A | § | |
| RECONSTRUCTIVE ORTHOPEDIC | § | |
| CENTER OF HOUSTON, AND | § | 281 ST JUDICIAL DISTRICT |
| ROC ASC, L.L.P. | § | |
| <i>DEFENDANTS.</i> | § | |

DEFENDANTS' ORIGINAL ANSWER

Defendants ROC-Houston, P.A. d/b/a Reconstructive Orthopedic Center of Houston and ROC ASC, LLP ("Defendants") now file this Original Answer.

GENERAL DENIAL

Pursuant to Rule 92 of the Texas Rules of Civil Procedure, Defendants generally deny the matters pled by Plaintiff and demand strict proof thereof.

AFFIRMATIVE AND OTHER DEFENSES

1. Plaintiff's claims should be dismissed, in whole or in part, for failure to state a claim upon which relief may be granted.

2. Plaintiff's claims are barred, in whole or in part, to the extent that such claims exceed the scope of, or are inconsistent with, the Charge of Discrimination Plaintiff alleges that she filed with the Equal Employment Opportunity Commission and/or the Texas Workforce Commission.

3. Plaintiff's claims are barred, in whole or in part, by the applicable statute(s) of limitation to the extent they were not presented to the Equal Employment Opportunity Commission and/or the Texas workforce Commission in a timely fashion and to the extent they did not occur within the timeframes prescribed by applicable law.

4. More specifically, to the extent Plaintiff is asserting claims under the Texas Commission on Human Rights Act against ROC ASC, LLP, such claims are barred because Plaintiff never filed a charge of discrimination or retaliation against that entity.

5. Plaintiff's claims are barred to the extent she failed to satisfy any other administrative prerequisites or preconditions necessary to asserting such claims under applicable law.

6. All employment decisions regarding or affecting Plaintiff were based upon legitimate, non-retaliatory, non-discriminatory, or reasonable business reasons and factors that were in no way related to any alleged protected activity or other protected characteristic of Plaintiff.

7. Plaintiff's claims should be dismissed to the extent they are barred by the doctrines of estoppel, waiver, unclean hands, and/or laches, including the extent to which Plaintiff's own actions were in contravention of Defendant's policies and/or procedures and to the extent Plaintiff's own actions led to her separation from employment.

8. All employment decisions regarding or affecting Plaintiff were predicated on grounds other than, and would have been taken absent, Plaintiff's alleged protected activity or any other protected characteristic or status.

9. Without admitting that Plaintiff has suffered any damages, Plaintiff's claim for damages is barred, in whole or in part, by her failure to mitigate his alleged damages or, alternatively, to the extent Plaintiff has mitigated her damages in whole or in part, Defendants are entitled to an offset.

10. Without admitting that Plaintiff has suffered any damages, Plaintiff's alleged damages must be reduced by any wages, compensation, and/or other benefit received by

Plaintiff or which was earnable or receivable with the exercise of due diligence by the Plaintiff.

11. Plaintiff cannot recover any damages beyond those statutorily-capped damages provided by applicable law. To the extent Plaintiff is seeking punitive damages, they are limited by applicable statutes and the United States Constitution. Any award of punitive damages in this case would violate the United States Constitution.

12. Defendants are not liable for punitive damages, if any, because neither Defendant nor any of their employees committed any act against Plaintiff with malice.

13. To the extent applicable, and pending discovery, Plaintiff's claims and damages, if any, are barred by the doctrine of after-acquired evidence.

REQUEST FOR RELIEF

Defendants request that the Court enter judgment that Plaintiff take nothing, assess costs against Plaintiff, and award Defendants all other relief to which they are entitled at law or in equity.

Respectfully submitted,

DOW GOLUB REMELS & GILBREATH,
PLLC

/s/ Andrew S. Golub

Andrew S. Golub

Texas Bar No. 08114950

asgolub@dowgolub.com

Alexandra M. Wolf

Texas Bar No. 24089226

awolf@dowgolub.com

2700 Post Oak Blvd., Suite 1750

Houston, Texas 77056

Telephone: (713) 526-3700

Facsimile: (713) 526-3750

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on January 29, 2021, a true and correct copy of the foregoing served Texas e-file on the following:

Andrew M. Williams
Andrew M. Williams & Associates
6565 West Loop South, Suite 560
Houston, Texas 77401
andy@amwlawfirm.com

s/ Andrew S. Golub

Andrew S. Golub

EXHIBIT B-3

All Orders Signed by the State Judge

None

EXHIBIT B-4

HCDistrictclerk.com

BODEUX-PINE, COLLEEN vs. ROC-HOUSTON P A
(D/B/A RECONSTRUCTIVE ORTHOPEDIC C
Cause: 202082640 CDI: 7 Court: 281

2/4/2021

APPEALS

No Appeals found.

COST STATMENTS

No Cost Statments found.

TRANSFERS

No Transfers found.

POST TRIAL WRITS

No Post Trial Writs found.

ABSTRACTS

No Abstracts found.

SETTINGS

No Settings found.

NOTICES

No Notices found.

SUMMARY**CASE DETAILS**

File Date 12/23/2020
Case (Cause) Location Civil Intake 1st Floor
Case (Cause) Status Active - Civil
Case (Cause) Type OTHER CIVIL
Next/Last Setting Date N/A
Jury Fee Paid Date N/A

CURRENT PRESIDING JUDGE

Court 281st
Address 201 CAROLINE (Floor: 14)
HOUSTON, TX 77002
Phone:7133686430
JudgeName CHRISTINE WEEMS
Court Type Civil

ACTIVE PARTIES

| Name | Type | Post Attorney Jdgm |
|--|-------------------|------------------------|
| BODEUX-PINE, COLLEEN | PLAINTIFF - CIVIL | WILLIAMS, ANDREW M. |
| ROC-HOUSTON P A (D/B/A RECONSTRUCTIVE ORTHOPEDIC CENTER OF HOUSTON) | DEFENDANT - CIVIL | GOLUB, ANDREW S. |
| ROC ASC LLP | DEFENDANT - CIVIL | GOLUB, ANDREW S. |
| RECONSTRUCTIVE ORTHOPEDIC CENTER OF HOUSTON | DEFENDANT - CIVIL | GOLUB, ANDREW S. |
| ROC-HOUSTON P A (D/B/A RECONSTRUCTIVE ORTHOPEDIC CENTER OF HOUSTON) | REGISTERED AGENT | |
| ROC ASC LLP (IS A LIMITED LIABILITY | REGISTERED AGENT | |

PARTNERSHIP) MAY BE SERVED THROUGH

INACTIVE PARTIES

No inactive parties found.

JUDGMENT/EVENTS

| Date | Description | Order Signed | Post Jdgm | Pgs /Page | Volume Filing Attorney | Person Filing |
|------------|--------------------------|--------------|-----------|-----------|------------------------|--|
| 1/29/2021 | ANSWER ORIGINAL PETITION | | | 0 | | GOLUB, ANDREW S. ROC ASC LLP |
| 1/29/2021 | ANSWER ORIGINAL PETITION | | | 0 | | GOLUB, ANDREW S. RECONSTRUCTIVE ORTHOPEDIC CENTER OF HOUSTON |
| 1/29/2021 | ANSWER ORIGINAL PETITION | | | 0 | | GOLUB, ANDREW S. ROC-HOUSTON P A (D/B/A RECONSTRUCTIVE ORTHOPEDIC CENTER OF HOUSTON) |
| 12/23/2020 | ORIGINAL PETITION | | | 0 | | WILLIAMS, ANDREW M. BODEUX-PINE, COLLEEN |

SERVICES

| Type | Status | Instrument | Person | Requested | Issued | Served | Returned | Received | Tracking | Deliver To |
|---|-------------------|--|------------|------------|----------|-----------|----------|----------|----------|------------------|
| CITATION SERVICE RETURN/EXECUTED | ORIGINAL PETITION | ROC-HOUSTON P A (D/B/A RECONSTRUCTIVE ORTHOPEDIC CENTER OF HOUSTON) | 12/23/2020 | 12/28/2020 | 1/8/2021 | 1/11/2021 | | 73826069 | | MAIL TO ATTORNEY |
| 1200 BINZ STREET SUITE 100 HOUSTON TX 77004 | | | | | | | | | | |
| CITATION SERVICE RETURN/EXECUTED | ORIGINAL PETITION | ROC ASC LLP (IS A LIMITED LIABILITY PARTNERSHIP) MAY BE SERVED THROUGH | 12/23/2020 | 12/28/2020 | 1/8/2021 | 1/11/2021 | | 73826071 | | MAIL TO ATTORNEY |
| 1200 BINZ STREET SUITE 100 HOUSTON TX 77004 | | | | | | | | | | |

DOCUMENTS

| Number | Document | Post Jdgm | Date | Pgs |
|----------|--|-----------|------------|-----|
| 94164182 | Defendants' Original Answer | | 01/29/2021 | 4 |
| 93951325 | Citation | | 01/13/2021 | 5 |
| 93951327 | Citation | | 01/13/2021 | 3 |
| 93659077 | Plaintiff's original petition and request for disclosure | | 12/23/2020 | 6 |

EXHIBIT B-5

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

COLLEEN BODEUX-PINE,
PLAINTIFF

VS.

ROC-HOUSTON, P.A. D/B/A
RECONSTRUCTIVE ORTHOPEDIC
CENTER OF HOUSTON, AND
ROC ASC, L.L.P.
DEFENDANTS.

§
§
§
§
§
§
§
§
§

Civil Action No. _____

INDEX OF MATTERS BEING FILED

As required under Local Rule 81, the following is a list of the documents being filed with the Notice of Removal in this action:

- A. Notice of Dismissal and Right to Sue Issued to Colleen Bodeux-Pine;
- B-1. All Process Issued in the state court
- B-2. Plaintiff's Original Petition and Defendants' Original Answer filed in the state court;
- B-3. All orders signed by the state judge (none);
- B-4. The state court docket sheet;
- B-5. This Index of Matters Being Filed; and
- B-6. A List of Counsel (including contact information).

EXHIBIT B-6

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

COLLEEN BODEUX-PINE,
PLAINTIFF

VS.

ROC-HOUSTON, P.A. D/B/A
RECONSTRUCTIVE ORTHOPEDIC
CENTER OF HOUSTON, AND
ROC ASC, L.L.P.
DEFENDANTS.

§
§
§
§
§
§
§
§
§

Civil Action No. _____

LIST OF COUNSEL

Pursuant to Local Rule 81, listed below are all counsel of record:

Plaintiff:

Andrew M. Williams
Texas Bar No. 21510835
andy@amwlawfirm.com
Andrew M. Williams & Associates
6565 West Loop South, Suite 560
Bellaire, Texas 77401
Tel: (713) 840-7321
Fax: (713) 839-1302

Defendants:

Andrew S. Golub
Texas Bar No. 08114950
Fed. Bar No. 13812
asgolub@dowgolub.com
Alexandra M. Wolf
Texas Bar No. 24089226
Fed. Bar No. 3159449
awolf@dowgolub.com
Dow Golub Remels & Gilbreath, PLLC
2700 Post Oak Blvd., Suite 175
Houston, Texas 77056
Telephone: (713) 526-3700
Facsimile: (713) 526-3750